

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

RE-NOTICE OF DEPOSITION

TO: Stephen P. Casarino, Esquire
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Pursuant to Federal Rule of Civil Procedure 30(b)(6), examination of Harleysville is requested relevant to the policy of insurance written by Harleysville, specifically Commercial Package Policy No. MPA 812988 (the "Policy"), and concerning the loss at issue in this litigation sustained by plaintiff on June 22, 2004 at the property located at 1740 W. 4th Street in Wilmington, Delaware and the related claim for coverage under the Policy (the "Claim"). The deposition will take place on Tuesday, September 11, 2007 at 10:00 a.m. at the offices of Smith, Katzenstein & Furlow LLP, 800 Delaware Avenue, Suite 1000, Wilmington, DE. As to all fields of examination, the relevant time period shall be June 2004 through the end of 2004. The fields of examination are as follows:

(1) Harleysville's policies and procedures with respect to coverage termination and notice thereof to its insured;

- (2) Harleysville's policies and procedures with respect to acceptance and processing of premium payments from insureds, including late premium payments;
- (3) Harleysville's policies and procedures on the effective cancellation date selected by Harleysville when cancelling property insurance;
- (4) Harleysville's policies and procedures with respect to adequate justifications for the cancellation of insurance policies, including the type at issue in this suit and retroactive cancellations after claims have been made on a policy;
- (5) Harleysville's policies and procedures regarding claims notes and notations, including methods of recording and reading claims notes;
- (6) Harleysville's denial of the Claim and cancellation of the Policy at issue;
- (7) The history of the Claim at issue including all direction and communications with third parties or plaintiff;
- (8) All payments made associated with this claim, whether withdrawn or not;
- (9) Harleysville's policy as to the number of cancellation notices required to be sent and the effective date of that cancellation for the type of policy at issue.

SMITH, KATZENSTEIN & FURLOW LLP

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September 10, 2007